

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
Eastern DIVISION

Serge Davis

FILED

OCT 13 2005

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO

Case No.

NAME OF THE PLAINTIFF OR PLAINTIFFS

(Enter above the full names of each plaintiff in this action.)

UFCW Local 655

- vs -

4:05CV01862CDP

*Original
Demanded*

NAME OF THE DEFENDANT OR DEFENDANTS

(Enter above the full name of ALL defendant(s) in this action. Fed. R. Civ. P. 10(a) requires that the caption of the complaint include the name of all the parties. Please attach additional sheets if necessary.)

COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964, as amended, for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. § 2000e-5. Venue is proper in this district under 42 U.S.C. § 2000e-5(f)(3).

2. Plaintiff

Serge Davis
(name of plaintiff)

resides at:

1713 Andrew St
(street address)

St. Louis
(city)

Missouri
(state)

63134
(ZIP code)

Phone:

314 867-1663

3. The defendant

VF CW Local 655
(name of defendant)

is an employer, employment agency, or labor organization, as defined in 42 U.S.C. § 2000e, and lives at or its place of business is located at:

388 Weidman Rd., Ballwin,
(street address) (city)

St. Louis, Missouri, 1.
(county) (state) (zip code)

NOTE: IF THERE IS MORE THAN ONE PERSON FILING THE COMPLAINT OR IF YOU ARE SUING MORE THAN ONE PERSON OR COMPANY, PLEASE ADD THE NAMES AND ADDRESSES OF THE ADDITIONAL PERSONS OR COMPANIES ON A SEPARATE SHEET OF PAPER. COPY THE LANGUAGE IN PARAGRAPHS 2 AND 3 FOR ADDITIONAL PLAINTIFFS OR DEFENDANTS.

4. The address at which plaintiff sought employment or was employed by the defendant(s) is:

232 W. Hwy 67,
(street address)
Florissant, St. Louis, Missouri, 63031.
(city) (county) (state) (zip code)

5. Defendant discriminated against the plaintiff in the manner indicated in paragraphs 9 and 10 of this complaint on or about: From June 04 thru August 2005
(month) (day) (year)

6. Plaintiff filed charges against the defendant with the Missouri Commission on Human Rights, charging defendant with the acts of discrimination indicated in paragraphs 9 and 10 of this complaint, on or about _____.
(month) (day) (year)

7. Plaintiff filed charges against the defendant with the Equal Employment Opportunity Commission, charging defendant with the acts of discrimination indicated in paragraphs 9 and 10 of this complaint, on or about August 2005.
(month) (day) (year)

8. The Equal Employment Opportunity Commission issued a Notice of Right to Sue Letter which was received by the plaintiff on September 28 2005, a copy of which is attached to
(month) (day) (year)
this complaint.

9. The acts that I complain of in this suit, concern defendant's:

(a) _____ failure to employ me.

(b) _____ termination of my employment.

(c) _____ failure to promote me.

(d) ☒ other acts (specify): Failure to file
grievance as asked to and support me as
a union member

10. Defendant's action(s), as stated in paragraph 9, is discriminatory with respect to the following:

(a) _____ my race.

(d) _____ my national
origin

(b) _____ my religion.

(f) ☒ other (specify)

(c) _____ my sex.

Discrimination

11. The circumstances under which defendant(s) discriminated against the plaintiff were as follows (Note: if you are suing more than one defendant, please complete this question with regard to each of the named defendants):

Failure to file grievances as asked to do so. Union did not support me as a union member. Union Representative told me that she could not help me because she represented the company as well

(Attach additional sheets as necessary.)

12. The acts set forth in paragraph 9 of this complaint are:

- (a) _____ still being committed by the defendant.
- (b) ☒ _____ are no longer being committed by the defendant.
- (c) _____ may still be being committed by the defendant.

13. Plaintiff attaches to this complaint a copy of the charges filed with the Equal Employment Opportunity Commission, and submits said charges as a brief statement of the facts supporting this complaint.

Wherefore, plaintiff prays for (state what relief is sought):

Reimbursement of all union dues.

and such other relief as the Court would allow under Title VII of the Civil Rights Act of 1964, as amended.

Signed this 13 day of October, 2005.

[Signature]

Signature of Plaintiff(s)